

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SINGULARDTV, GMBH,

Plaintiff,

v.

ZACHARY LEBEAU and KIMBERLY
JACKSON,

Defendants.

Case No. 1:21-cv-10130 (VEC)

[PROPOSED] CONSENT ORDER

WHEREAS, on November 29, 2021, Plaintiff filed a Motion for Order to Show Cause Why Preliminary Injunction Should Not Issue and, in the interim, Temporary Restraining Order, in the above-captioned action (ECF No. 12) (the “Motion”);

WHEREAS, the hearing on the Motion is currently scheduled for January 5, 2022 (the “Hearing”);

WHEREAS, the Court granted a Temporary Restraining Order (“TRO”) in connection with the Motion (Dkt. No. 21), amended the TRO on December 2, 2021 (Dkt. No. 25), and extended the TRO on agreement of the Parties until the date of the Hearing on December 9, 2021 (Dkt. No. 48);

WHEREAS, the Parties are actively discussing a potential resolution to the Motion;

WHEREAS, the Parties jointly agree to adjourn the Hearing and extend the TRO for 14 days or for such additional time as the Court’s schedule permits;

IT IS ORDERED that the Hearing scheduled on January 5, 2022 is adjourned until [_____];

IT IS ORDERED that the TRO, as amended, is extended on agreement by the Parties until [_____].

Dated: New York, New York
December ___, 2021

ISSUED:

Hon. Valerie E. Caproni
United States District Judge